

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEIRDRE MACNAMARA, et al.,  
individually and on behalf of those similarly situated,

04-CV-9216 (RJS) (JCF)

Plaintiffs,  
-against-

ECF Case

THE CITY OF NEW YORK, a municipal entity, et al.,

Defendants.

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JOSEPH AMATO, et al.,  
(formerly ABDELL, et al.)

05-CV-8453 (RJS) (JCF)

Plaintiffs,  
-against-

ECF Case

THE CITY OF NEW YORK, et al.,

Defendants.

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SARAH COBURN, et al.,  
JEFFREY PHILLIPS, et al.,  
EMILY SLOAN, et al.,  
GWYNN GALITZER,  
BETTY BASTIDAS, et al.,  
RANDY XU, et al.  
NIKOLAS SIKELIANOS,  
UDO DRESCHER,

05-CV-7623 (RJS) (JCF)  
05-CV-7624 (RJS) (JCF)  
05-CV-7668 (RJS) (JCF)  
05-CV-7669 (RJS) (JCF)  
05-CV-7670 (RJS) (JCF)  
05-CV-7672 (RJS) (JCF)  
05-CV-7673 (RJS) (JCF)  
05-CV-7541 (RJS) (JCF)

Plaintiffs,  
-against-

ECF Cases

THE CITY OF NEW YORK, et al.,

Defendants.

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**DECLARATION OF CLARE NORINS IN OPPOSITION  
TO DEFENDANTS' OBJECTIONS TO JUDGE FRANCIS'S ORDER  
GRANTING PLAINTIFFS PARTIAL LEAVE TO AMEND THEIR COMPLAINTS**

CLARE NORINS, an attorney duly admitted to practice in this Court, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am counsel for plaintiffs and the putative class members in MacNamara, et al. v. City of New York, et al., 04-CV-9216 (RJS) (JCF). I submit this declaration in opposition to

defendants' objections to Judge Francis's January 23, 2008 Memorandum and Order that partially granted plaintiffs' motions in the consolidated RNC litigation to amend their complaints.

2. The following exhibits cited in plaintiffs' opposition to defendants' objections are attached hereto:

**Exhibit A** MacNamara and Abdell (now Amato) Plaintiffs' Reply Memorandum of Law in Support of Motion for Leave to File Second Amended Class Action Complaint

**Exhibit B** Case Management Orders in Drescher v. City of New York, et al., 05-CV-7541 (RJS) (JCF), Coburn v. City of New York, et al., 05-CV-7623 (RJS) (JCF) & Bastidas, et al. v. City of New York, et al., 05-CV-7670 (RJS) (JCF)

**Exhibit C** March 7, 2008 Letter from Assistant Corporation Counsel Gerald Smith to Judge James C. Francis, IV

**Exhibit D** November 28, 2006 Letter from Chris Dunn to Judge James C. Francis, IV

**Exhibit E** March 12, 2007 Memorandum and Order in Schiller, et al. v. City of New York, et al., 04-CV-7922 (RJS) (JCF) and Dinler, et al. v. City of New York, et al., 04-CV-7921 (RJS) (JCF)

**Exhibit F** April 25, 2007 Letter from Jeffrey Rothman to Judge James C. Francis, IV

**Exhibit G** April 25, 2007 Letter from Beldock Levine & Hoffman LLP to Judge James C. Francis, IV

**Exhibit H** May 23, 2007 Letter from Michael Spiegel to Judge James C. Francis, IV

**Exhibit I** July 5, 2007 So-Ordered Consolidated Deposition Schedule

**Exhibit J** Third Amended Complaint in Amato, et al. v. City of New York, et al., 05-CV-8453 (RJS) (JCF)

**Exhibit K** First Amended Complaint in Phillips, et al. v. City of New York, et al., 05-CV-7624 (RJS) (JCF)

**Exhibit L** Excerpts from Second Amended Class Action Complaint in MacNamara, et al. v. City of New York, et al., 04-CV-9216 (RJS) (JCF)

**Exhibit M** Excerpt from March 28, 2007 Deposition of David Cohen - **Confidential**

**Exhibit N** Judith Miller, "When Activists Are Terrorists," The Wall Street Journal, May 3, 2007 at A17

**Exhibit O** October 24, 2006 Letter from the Office of the New York County District Attorney to Judge James C. Francis, IV

**Exhibit P** May 2, 2007 Declaration of Deputy Commissioner David Cohen

**Exhibit Q** February 27, 2008 Memorandum and Order of Senior District Court Judge Haight  
in Handschi, et al. v. Special Services Division, et al., 71-CV-2203 (CSH)

**Exhibit R** February 3, 2008, 3:42 p.m. email from Clare Norins to defense counsel Raju  
Sundara, James Mirro and Peter Farrell

Dated: New York, New York  
March 17, 2008



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Clare Norins (CN 2821)